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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 22, 2017

Thomas Wohlford, Interim Closure Manager
Homestake Mining Company of California
P.O. Box 98
Grants, NM 87020

RE: Homestake Mining Company of California (HMC), DP-200, New Mexico Environment Department (NMED), Mining Environmental Compliance Section (MECS), Response to *Request to Begin Post-Closure Monitoring of Western Portion of North-Offsite Area (Condition 58)*

Dear Mr. Wohlford:

NMED-MECS has exchanged the following correspondence with Homestake Mining Company of California relating to the above-referenced Condition 58 of DP-200.

- HMC, January 16, 2015; “Post –closure groundwater monitoring plan IAW Condition 58 of DP-200, and Proposed location for final deposition of sediments and debris from groundwater treatment activities IAW Condition 22 of DP-200”
- NMED, March 2, 2015; “Homestake Mining Company of California/Discharge Permit DP-200 - New Mexico Environment Department Comments on ‘Post –closure groundwater monitoring plan IAW Condition 58 of DP-200, and Proposed location for final deposition of sediments and debris from groundwater treatment activities IAW Condition 22 of DP-200’ (January 16, 2015)”
- HMC, August 11, 2015; “Homestake’s responses to NMED’s comments received 2 March 2015 pertaining to Homestake’s ‘Post –closure groundwater monitoring plan IAW Condition 58 of DP-200, and Proposed location for final deposition of sediments and debris from groundwater treatment activities IAW Condition 22 of DP-200’ (January 16, 2015)”

- NMED, September 1 2015; "Homestake Mining Company of California/Discharge Permit DP-200 – Conditional approvals of final repository designation for contaminated sediments (DP-200/Condition 22), and post-closure ground water monitoring plan (DP-200/Condition 58)
- HMC, December 8, 2015; Request to begin post-closure monitoring of western portion of north-offsite area.

On December 8 2015, MECS received the *Request to Begin Post-Closure Monitoring of the Western Portion of the North-Offsite Area* (Request). The request has been reviewed and MECS has the following comments and request for additional information prior to approval of initiation of post-closure monitoring for the western portion of the north-offsite area.

1. Figure 4.1-1 of HMC's '2015 Annual Monitoring Report' dated March 31, 2016, shows the alluvial well locations for the Homestake Mill and adjacent properties. The map legend designates the 'use' of each well and its location. Figure 1 submitted in the Request displays the historical extent of the ground water contamination but does not show all wells within or adjacent to this area as shown in Figure 4.1-1. Within 90 days from the date of this letter, resubmit an updated figure displaying the historical extent of alluvial groundwater exceedances for the western portion of the North-offsite Area as well as the locations of all wells within and adjacent to this area of contamination along with a legend designating the 'use' and the aquifer each well is completed in. If a well is currently not actively being used for remedial efforts, it should be noted as such in the legend. The figure shall be sized to at least 11" x 17" so that monitoring well identification is legible to facilitate MECS's evaluation.
2. Within 90 days from the date of this letter, submit an updated Figure 4.1-2 of HMC's '2015 Annual Monitoring Report' dated March 31, 2016. The base elevations of the alluvial aquifer for several monitoring wells on this figure do not match elevations stated in Tables 2 and 3 of HMC's December 8, 2015 request. Additionally, the contour lines displayed on Figure 4.1-2 of the 2015 Annual Monitoring Report are drawn incorrectly and need to be redrawn after base elevations, stated above, are recalculated. Base elevations and contour lines shall be drawn by using all alluvial wells for the Homestake Mill and adjacent properties. The figure(s) shall be sized to at least 11" x 17" so that monitoring well identification and contour elevation lines are legible to facilitate MECS's evaluation.
3. The well data submitted in Table 2 of the request, states a saturated thickness of 88.1' with a depth to water measurement of 49.6' for Well 996. However, Table 2-4 of HMC's 'Supplemental Information on Remediation Strategy' states a saturated thickness of 34.0' with a depth to water measurement of 103.73'. Within 90 days from the date of this letter, review well data submitted in Tables 2 and 3 and submit corrected tables. Also, see Comment 2 above.

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4. Within 90 days from the date of this letter, submit all ground water quality data (table format), well logs, and well completion data for all wells (all aquifers) in the western portion of the North off-site area being proposed for post-closure monitoring.
5. Within 90 days from the date of this letter, submit all ground water quality data (table format), well logs, and well completion data for wells 636, 637, 686, 907, 911, 936, 938, 997 and 998 located along County Road 63 in the southern portion of Section 20 and in the northern and western portions of Sections 5, 29 and 32. Information will be evaluated for contaminants of concern within the northern extent of the Rio San Jose Alluvium and within the San Andres Aquifer.
6. Within 90 days from the date of this letter, submit figures (time-series plots) showing the water-level elevations over time for all wells within and adjacent to the historical ground water impacted area of the western portion of the North off-site area.
7. Within 90 days from the date of this letter, submit figures (time-series plots) showing the ground water concentrations over time for contaminants of concern for all wells within and adjacent to the historical ground water impacted area of the western portion of the North off-site area.
8. Within 90 days from the date of this letter, submit updated potentiometric surface maps for all aquifers utilizing the most recent water level data from all wells within and adjacent to the historical ground water impacted area of the western portion of the North off-site area.
9. Within 90 days from the date of this letter, submit isoconcentration contour maps for all aquifers utilizing the most recent water quality data for contaminants of concern from all wells within and adjacent to the historical ground water impacted area of the western portion of the North off-site area.
10. Within 90 days from the date of this letter, HMC shall state the contaminants of concern to be analyzed from each monitoring well proposed for post-closure monitoring. Post-closure monitoring shall, at a minimum, include analysis for all contaminants of concern for which Site background ground water quality standards have been established (see DP-200, Table 1).

If you have any questions, please contact Bill Pearson at (505) 827-0602 or by e-mail at william.pearson@state.nm.us.

Sincerely,



Kurt Vollbrecht, Program Manager
Mining Environmental Compliance Section
Ground Water Quality Bureau

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E-Mailed Copies:

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